



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 20, 2012

By Facsimile

Honorable Loretta A. Preska
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: United States v. Ryan Ackroyd et al. (Jeremy Hammond),
S1 12 Cr. 185 (LAP)

Dear Judge Preska:

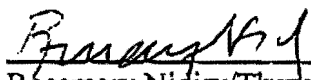
The Government respectfully proposes that, in light of the issues regarding discovery raised by the defense at today's conference and in its November 12, 2012 bail application, the Court's May 29, 2012 Protective Order in this case be modified as set forth below. Specifically, the Government proposes removing the provision that restricts the defendant's ability to review protected materials outside of the presence of counsel or counsel's staff. Accordingly, ¶ 2(b) of the May 29, 2012 Protective Order should be amended to provide as follows:

- 2(b) "Shall be maintained in a safe and secure manner and shall not be disclosed in any form by the defendant or his counsel except as set forth in paragraph 2(c) below;"

Respectfully submitted,


PREET BHARARA
United States Attorney

by:


Rosemary Nidiry/Thomas Brown
Assistant United States Attorneys
(212) 637-1063/2194

cc: Elizabeth Fink, Esq./Sarah Kuntsler, Esq. (By Facsimile and Email)

SO ORDERED:


LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

November 1, 2012